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Attorneys for Defendants
UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF THOMAS J.
PARDINI IN SUPPORT OF
PLAINTIFF WAYMO LLC'S
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL ITS RESPONSE
TO COURT INQUIRY RE UBER'S
FAILURE TO PRODUCE JACOBS
LETTER AND EMAIL (DKT. 2327)**

1 I, Thomas J. Pardini, declare as follows:

2 1. I am a member of the Bar of the State of California and an attorney at the law firm
3 of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal
4 knowledge and if called as a witness, I could and would competently testify to the matters set
5 forth herein. I make this declaration in support of Plaintiff Waymo LLC's Administrative Motion
6 to File Under Seal Its Response to Court Inquiry Re Uber's Failure to Produce Jacobs Letter and
7 Email (Dkt. 2327).

8 2. I have reviewed the following documents and confirmed that only the portions
9 identified below merit sealing:

Document	Portions to Be Filed Under Seal
Exhibit 1	Blue Highlights in Waymo's version
Exhibit 7	Blue Highlights in attached version
Exhibit 8	Yellow Highlights in attached version

15 3. The blue highlights of Exhibit 1 and Exhibit 7 contain highly confidential
16 information regarding a list of Uber's internal servers. I understand that disclosure of this
17 information could compromise the security and privacy of these internal servers.

18 4. The yellow highlights of Exhibit 8 contain references to the same type of
19 confidential material for which the Court granted sealing in its November 29, 2017 Order,
20 marking such information in green highlighting in Exhibit B to the Court's Order. (Dkt. 2307-2.)
21 The yellow highlights of Exhibit 8 similarly contain information that implicates the safety,
22 privacy, and reputational interests of former and current Uber employees and vendors, as well as
23 various third-party individuals and entities.

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5. Defendants' request to seal is narrowly tailored to the portions of Waymo's Response and supporting exhibits that merit sealing.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 8th day of December, 2017 at San Francisco, California.

/s/ Thomas J. Pardini
Thomas J. Pardini